

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 21, 2013

Ms. Cristina Griffin, Agent For: KIK Pool Additives, Inc. Delta Analytical Corporation 12510Prosperity Drive, Suite 160 Silver Spring, Maryland 20904

SUPJECT:

NOTIFICATION OF MINOR LABEL CHANGES PER PR NOTICE 98-10

PRODUCT NAME: 3-Inch Chlorinating Tablets

EPA REGISTRATION NUMBER: **7616-18** APPLICATION DATE: March 4, 2013

APPLICATIO RECEIVED DATE: March 7, 2013

Dear Ms. Griffin:

This acknowledges receipt of your Notification application, submitted under the provisions of FIFRA section 3(c) 7(A) and PR Notice 98-10.

Pesticide Application:

KIK Pool Additives, Inc. is submitting the following Minor Label Changes for Reg. No. 7616-18:

On Pages Three Through Four:

Adding Minor, Optional Marketing Claims;

On Page Five:

Revise formatting: move the EPA-approved Reader's Note directly underneath the "Directions For Use" heading so that they are easier to find and adding two Reader's Notes within the text to clarify and simplify the Product Label;

On Page Seven:

Add explanatory graphics.

General Comments:

Based on the review of the submitted material, the following comments apply. The Notification application is **Acceptable**. A copy of the **accepted** Notification is attached in **Regulatory File Jacket 7616-18** for future reference.

If you have questions or comments with regard to this Agency Letter, the please contact Killian Swift via email at **Swift.Killian@epa.gov** or by telephone at **703-308-6346**. When you are submitting information or data in response to this Agency Letter, please send a copy of this Agency Letter with your response in order to facilitate processing.

Sincerely-yours,

Monisha Harris,

EPA Product Manager 32

Regulatory Management Branch II Antimicrobials Division 7510P

OMB No. 2070-0060.



United States

Environmental Protection Agency Washington, DC 20460

| | Registration |
|---|------------------|
| | Amendment |
| Y | Other |

OPP Identifier Number

NOTIF

| <u> </u> | | Application for P | esticide - Section I | · | | | | |
|---|--|---|--|---|-------------------------------------|---------------------------------------|--|--|
| 1. Company/Product Number 7616-18 | 2: EPA Product Manager Monisha Harris | | Proposed Classification □ None □ Restricted | | | | | |
| 4. Company/Product (Name) KIK Pool Chlorinating Tablets | PM# 32 | | None | | | | | |
| 5. Name and Address of Applicant (<i>Include</i> KIK Pool Additives Inc. c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite Silver Spring, MD 20904 | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No Product Name | | | | | | | |
| Section - II | | | | | | | | |
| □ Amendment - Explain below □ Resubmission in response to Agency let X Notification - Explain below. | ter dated | | ☐ Final printed labels in response to Agency letter dated ☐ "Me Too" Application. ☐ Other - explain below. | | | | | |
| Explanation: Use additional page(s) if ne | cessary. (For s | section I and Section II.) | | | | | | |
| Notification per PR Notice 98-10 to make minor label changes, add graphics and add an Alternate Brand Name. | | | | | | | | |
| This notification is consistent with the labeling or the confidential statement of statement to EPA. I further understand in violation of FIFRA and I may be sub- | of formula of t I that if this n | his product. I understand otification is not consisten | I that it is a violation of 18 U. It with the terms of PR Notice | .S.C. Sec. 1001 e 98-10 and 40 | to willfully | make any false | | |
| Section - III | | | | | | | | |
| 1. Material this Product will be Package | ed in: | · | | | <i>f</i> | <u> </u> | | |
| Child-Resistant Packaging ☐ Yes* For retail ☐ No ☐ No ☐ Unit Packaging ☐ Yes ☐ Yes ☐ No | | | Water Soluble Packaging ☐ Yes ☐ No | | 2. Type of Container Metal Plastic | | | |
| * Certification must be submitted. | , | | | ☐ Glass ☐ Paper r container ☐ Other (Specify) | | | | |
| 3. Location of Net Contents Information 4. Size(s) of Retail Contain | | | ner | ☐ On Label | | | | |
| □ Label □ Container □ On Labeling accompanying product 6. Manner In Which Label Is Affixed to Product □ Lithograph □ Paper glued □ Stenciled □ C C C C C C C C C C C C C C C C C C | | | | | | | | |
| Section - IV | | | | | | | | |
| Contact Point (Complete items directly be a contact.) | elow for identif | | | this application. |) | 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 | | |
| Name | Title | | Telephone | No. (Include Area ငုဝုမှုခု) | | | | |
| Cristina Griffin | Agent for KIK Pool Additives Inc. | | 301-680-739761, 6 . | | | | | |
| I certify that the statements I have made or of knowingly false or misleading statement | any kind | 6. Date Application Received | | | | | | |
| 2. Signature | 3. Title | (Stamped) | | | | | | |
| 4. Typed Name Cristina Griffin | 5. Date March 5, 2013 | | | | | | | |



March 4, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Monisha Harris, PM 32

RE: Notification per PR Notice 98-10 to make minor label changes, add graphics and

add an Alternate Brand Name

Product:

3-Inch Chlorinating Tablets

EPA Reg. No.:

7616-18

Company:

KIK Pool Additives Inc.

Dear Ms. Harris:

On behalf of KIK Pool Additives Inc., I am submitting a notification per PR Notice 98-10 to make minor label changes, add graphics and add an Alternate Brand Name for the product 3-Inch Chlorinating Tablets, EPA Reg. No. 7616-18.

The Alternate Brand Name is "HDX 99% Multi-Functional 3" Tabs."

We are making the following minor label changes including: (changes are highlighted)

- Addition of label claims
- Formatting: moving the EPA approved reader's note to directly under the "Directions for Use" heading so it's easier to find, and adding a couple of reader's notes within the text to clarify and simplify the label
- Addition of graphics

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- One copy of the revised label (changes are highlighted)

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely

Cristina Griffin

Agent for KIK Pool Additives Inc.

Enclosures

cc: Elvia

Elvia Angulo, KIK Pool Additives Inc.

Justin Lowe, KIK International

KEM-TEK

3-INCH CHLORINATING TABLETS

[Adding the following new Alternate Brand Name:]
HDX 99% Multi-Functional 3" Tabs
[Previously Approved Alternate Brand Name:]
Kem-Tek Pool & Spa Care Power 99 3" Chlorinating Tablets

For Control of Algae & Bacteria Stabilized . Slow Dissolving . For Floaters & Feeders . For Treatment of Black Algae

KEEP OUT OF REACH OF CHILDREN

DANGER Date Revelwed:
Reviewed By:

NOTIFICATION MOPCIL 81,8013

Revelwed: MOPCIL 81,8013

See back [Side] [Top] panel for [first aid statement and] other precautions [or SEE [FIRST AID STATEMENT AND] ADDITIONAL PRECAUTIONS ON BACK [Side] [Top] PANEL]

Free Pool Care Advice 1-800-SOS-POOL . www.kem-tek.com

FIRST AID: Call a poison control center [(1-800-222-1222)] or doctor for treatment advice. Have the product container or label with you when calling poison control center or doctor, or going for treatment. If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration preferably mouth-to-mouth, if possible. If swallowed: Have person sip a glass of water if able to swallow. DO NOT induce vomiting unless told to do so by poison control center or doctor. Do not give anything by mouth to an unconscious person. Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage:

[First Aid may be in table form]

Net Wt.:

[The following may appear in any appropriate place on the label:]

Manufactured by [for]: KIK Pool Additives Inc. 5160 E. Airport Dr. Ontario, Calif. 91761

[Optional: Following may be included in addition to "Manufactured by [for]" address above: Distributed by [or Sold by [or Marketed by [or Marketed Through] Insert additional company name and address]

EPA Reg. No. 7616-18

EPA Est. No. 7616-CA-1

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal if inhaled. Do not breathe dust or spray mists. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

[In accordance with PR notice 95-1, use the following complete Environmental Hazards statement for containers 50 pounds and larger]

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

[For containers smaller than 50 pounds use the following:]

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms.

PHYSICAL OR CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES. CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE CONTAINING GASES. DECOMPOSES AT 460°F to 480°F WITH LIBERATION OF HARMFUL GASES.

IN CASE OF FIRE, if possible isolate container in open air or well ventilated area. Flood with large volume of water. IN CASE OF CONTAMINATION OR DECOMPOSITION, do not reseal container.

[Optional Label Claims/location optional:] [Claims may be in upper or lower case] 1/2 [Pound Tablet[s]] [lb Tablet] 3" [3-Inch] Tablets [4][5]-In-One [product][[chlorinating] tablets] 5-Step Pool Care [System] 7 Day Tablet 8 oz Tablet[s] ABC Smart[er] Pool Care [System] A Component of the Kem-Tek Pool Care System Advanced Formula Algae [Fighter] [Fighting] [Killer] [Preventer] [Stopper] [Suppressant] Algaecide All-In-One [[chlorinating] tablets] Buffered [Sanitizer] [For pH Control] Buffers pH Built In [Clarifier] [Sun Protection] [to protect from sunlight burn-off] Chlorinate[s] [Up To One Week] Chlorinating [Sanitizer] [[&] [And]] [Algaecide] [[&] [And]] Clarifier] [Technology] Clarifies Concentrated [Chlorinating Agent] [8oz] [1/2] [Pound] [lb] [Tablet[s]] [Formula] Controls Algae, Kills Bacteria [[&] [And]] Destroys Organic Contaminants Convenient **Delivers Continuous Chlorination** Destroys [Algae] [Bacteria] [[&] [And]] Prevents Algae] Disinfectant Each Tablet Weighs 8 oz/1/2 lbs Easy To Use Eliminates Bacteria Fights Algae For assistance, call: xxx-xxx-xxxx For [All Types Of Pools] [Pools] [Pools [[&] [And]] Spa] [Pop-Up Pools] For Control of Algae [[&] [And]] Bacteria For Crystal Clear Water For Day-to-Day Chlorination For Floaters [[&] [And]] Feeders For Low Odor Sanitization For Treatment of Black Algae For Use With The Kem-Tek Feeder Good For All Pool Surfaces [Great] [Super] Value [Pack] Helps Prevent Corrosion [[&] [And]] Metal Staining Individually Wrapped [Tablets] Item # - - - -Jumbo [Size] [Tabs] [1/2 lb. Tabs] [1/2 lb. Tablets] Keeps Water [Clean] [&] [Clear] Kills [Algae [&] [And]] [Bacteria [[&] [And]] Controls Algae] Kills Bacteria Controls Algae Destroys Organic Contaminants Knocks Out Algae Long Lasting Made in USA Multi-Action [Formula] Chlorinator & Algaecide

Multi-Action System That Sanitizes [[&] [And]] Suppresses Algae Multi Function [Multi-function] [Multifunction] Formula - Chlorinator & Algaecide Multi-Function Pool Care Product - Chlorinator & Algaecide Multipurpose Product - Chlorinator & Algaecide No Need To Pre-Dissolve [Only For Swimming Pool] Open Here Oxidizer Part B Part Of The Simply Smart[er] [Pool Care] [Pool] System Removes Organic Waste [[&] [And]] Produces Sparkling Clean Swimming Pool Water Restores A Crystal Clarity To Pool Water Routine Chlorinator Salt System Compatible Sanitizer, Algaecide [[&] [And]] Clarifier [Sanitizer, Algaecide, [[&] [And]] Clarifier] [Sanitizer, Clarifier [[&] [And]] Algaecide] Sanitize[r][s] [Pool Water] [Water] Seven Day Tablet Simply B Simply Smart[er] [Pool Care] [System] Slow [Dissolving] [Release] Smartferl B Softens Water [Special Offer] [Extra] [Bonus] [Buy] [insert #] [Free] [Bag(s)] [Pouch(es)] [X lbs of Tablets] [X" Tablet Adjustable Dispenser of [product name or type] [Inside] [Included] Specially Formulated To Resist Crumbling Stabilized Step [Insert #] Step 2: Chlorinate Step #2 [Step Two] [Chlorine Treatment] [Of The Kem-Tek Pool Care System] Step B Swimming Pool Sanitizer

Time Release Formula [For Long Lasting Results]

UV [Protected] [Resistant]

Value Pack

Week-Long Chlorination

Wipes Out Algae

With Built-In Clarifier, [Filter Enhancer], [Water Conditioner] [[&] [And]] [Algae Preventative]

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling.

[Reader's Note: Throughout this label, product names for other similar products (i.e., pH adjusters, stabilizers, chlorinators etc.) may be substituted as appropriate.]

KEM-TEK 3-INCH CHLORINATING TABLETS are slow dissolving, concentrated tablets for use in erosion type feeders.

- 1. Remove everything from feeder and rinse thoroughly with fresh water. Never mix KEM-TEK 3-INCH CHLORINATING TABLETS with any other sticks, tablets or any other chemicals.
- 2. Fill the feeder with tablets.
- 3. Adjust the feed rate so as to maintain a chlorine residual of 1.0–1.5 ppm.
- 4. Check the pH of the pool water daily, adding [KEM-TEK pH MINUS or pH PLUS] or equivalent products as necessary to maintain pH in 7.2–7.6 range.
- 5. If the pool is not stabilized with [KEM-TEK STABILIZER CONDITIONER] or equivalent, add stabilizer to a concentration of 30 ppm. Consult the label on [KEM-TEK STABILIZER CONDITIONER] or equivalent product for exact instructions.

POOL STARTUP AND HEAVY BATHER LOAD: At the start of the swimming season, in filled pools, upon filling a pool, and after heavy swimmer load, super-chlorination (shocking) is necessary. Super-chlorination is the addition of two or three times the normal amount of chlorine to oxidize and remove unwanted organic and inorganic material. The end result is the establishment of a chlorine residual of 1.0–1.5 ppm. A liquid or granular chlorinating agent, [including [name of appropriate product]] which will dissolve rapidly, must be used for super-chlorination. Consult the labels [on [name of appropriate product]] for super-chlorination instructions. Do not use pool during super-chlorination until the chlorine residual is less than 3.0 ppm.

[Required on all labels] Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion.

[The following are to be used with different alternate brand names and are different forms of the same product:]

USE OF THE FLOATING CHLORINATOR

Do not use in spas, hot tubs or in water temperatures above 90°F.

- To use this container, cut off the two large knobs nearest the cap (at opposite sides). Locate and remove the small knob which corresponds to the pool capacity in gallons (Fig. 1). Holding the FLOATING CHLORINATOR neck down, shake lightly to level contents. FLOATING CHLORINATOR CONTAINS 1" CHLORINATING TABLETS (slow dissolving stabilized and highly concentrated).
- 2. Place FLOATING CHLORINATOR into the pool water neck down (Fig. 2). Monitor chlorine feed setting using a reliable test kit: chlorine residual should read from 1 to 1.5 ppm. To increase chlorine residual, cut off the small knob for the next higher pool capacity. As part of routine maintenance, superchlorinate regularly using a[n] [unstabilized] chlorine product [such as [name of appropriate product]]. Adjust pH as needed with [KEM-TEK pH MINUS or pH PLUS] keeping it between a 7.2 to 7.6 reading. To minimize chlorine consumption, add [KEM-TEK STABILIZER CONDITIONER] as needed to give a concentration of 30 ppm. Follow the instructions provided on these labels.
- FLOATING CHLORINATOR tilts when empty.

GRANULAR ALGAECIDE (BLACK ALGAE TREATMENT)

GRANULAR ALGAECIDE is a potent algaecide, which is effective against all algae when used as directed. It is especially effective against so-called "black" algae, which appears as spots on the walls and bottom of pools.

- 1. Check pH of water. Adjust pH (if necessary) to 7.2-7.6 using a reliable test kit and soda ash or dry pool acid.
- 2. Similarly, check available chlorine and adjust (if necessary) to a residual of 1.0 to 1.5ppm using GRANULAR ALGAECIDE dry or liquid chlorinating product.
- 3. Place one tablespoon of GRANULAR ALGAECIDE directly on the black spots (if on the pool bottom). If the spots are on the pool walls, place a tablespoon of GRANULAR ALGAECIDE on a 6" square cloth, tie and hang from the edge of the pool by the spot.
- 4. Wait 24 to 36 hours. Brush spots off with a wire algae brush and repeat steps 1 through 3 մոնի algae free.

NOTE: Do not allow [direct] contact of this product on the following pool surfaces: vinyl, metallic fiberglass painted or colored plaster. Product will bleach color out.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Keep product in tightly closed container when not in use. Store in a cool, dry, well wentilated area away from heat or open flame. In case of decomposition, isolate container in open area if possible, and flood with large amounts of water. CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. IF EMPTY: Place in trash [collection] or offer for recycling if available. IF PARTLY FILLED: Call your local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

[Optional Graphics]



Kills Algae & Bacteria

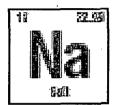


For Floaters & Feeders





Protected



Salt System Compatible















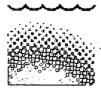






Keep children away from bucket with even a small amount of liquid.

Los niños pueden caprae a esta cubo y añogarse. No doja que los niños se acerquen a este cubo auaque sólo cantenga una pequeña cantidad de liquido.



Built-in Clarifier